

Response to Comments on Draft Environmental Assessment Proposed Lincoln County Landfill License Expansion – Libby, MT

The comment period on the draft EA started October 11, 2019. The comment period ended on November 10, 2019.

During the comment period, DEQ received 11 comments on the draft EA. Each comment was read and carefully considered. This document presents DEQ's responses. DEQ amended the final EA to reflect these changes.

1:

Comment: *In Section 2.3.2.4, we recommend a more general description recognizing that appropriate equipment will be obtained and used for an individual task that needs to be performed.*

Response: Section 2.3.2.4 is amended to address the comment. Narrative was added to describe renting equipment.

2:

Comment: *In Section 2.3.2.5, please consider including a description of large amounts of wetted demolition debris in a tarped truck. They may be assumed under "Group IV waste", but we were not sure.*

Response: Section 2.3.2.5 is amended to address this comment. Demolition debris is considered Group IV waste.

3:

Comment: *In Section 2.3.2.9, one sentence states, "As directed by two support personnel, any vacuum trucks or roll-off vacuum boxes would first enter the misting dome to dump its load. **The assistants would wet all ACWM loads with two hoses as dumping proceeds in the misting dome.**" Assistants shouldn't be inside the dome spraying while a dumping event is occurring. We suggest deleting the sentence in bold as it is determined to be too much of an occupational risk.*

Response: Section 2.3.2.9 is amended to address this comment. The sentence has been deleted.

4:

Comment: In Section 2.3.2.9, one sentence states, “Other ACWM would arrive in tarped or covered vehicles as double bagged vermiculite, burrito-wrapped demolition debris or small amounts of soil, and other double-bagged friable ACWM waste.” Please consider other types of debris coming into the cell that cannot be burrito wrapped or bagged.

Response: Section 2.3.2.9 is amended to address this comment. Narrative was added to further clarify the wastes that cannot be burrito-wrapped or bagged.

5:

Comment: In Section 2.3.2.9, one sentence states, “Bagged ACWM would be **handled separately** and placed separately on the lift in a safe manner to avoid punctures or tears that could release dust and fibers.” Please consider a truck load of waste bags coming to the asbestos cell. They wouldn’t be handled separately in this case.

Response: Section 2.3.2.9 is amended to address this comment. The questioned narrative is removed.

6:

Comment: In Section 2.3.2.9, one sentence states, “After disposing of the ACWM, each truck would exit the cell and stop on the pad, decon all exterior portions of the truck, vehicle, or equipment (including filters) before it exits the exclusion zone.” To clarify, filters are only changed at the end of the working season or before the equipment is returned to the owner.

Response: This comment is noted.

7:

Comment: In Section 2.3.2.10, one sentence states, “A “warm” containment area would be identified with caution tape **outside of the Class IV Unit perimeter fence** and located between two concrete Jersey barrier walls.” The warm zone is inside the Class IV perimeter fence.

Response: Section 2.3.2.10 is amended to address this comment. The narrative has been changed to say “inside”.

8:

Comment: In Section 2.3.2.11, one sentence states, “As noted above, waste delivered to the Class IV Unit would be temporarily stored in a secure area outside the gate until drier conditions allow

normal disposal operations.” To clarify, the waste delivered to the Class IV asbestos cell would be temporarily stored in a secure area inside, not outside, the gate.

Response: Section 2.3.2.11 is amended to address this comment. The narrative has been changed to say “outside”.

9:

Comment: *In Section 2.3.2.12, one sentence states, “In addition to filling the dome atmosphere with a dense fine mist of water, **two assistants would spray the vacuum box loads as they are dumped** into the concrete bin and saturated to control all gross vermiculite or ACWM emissions.” Assistants should not be inside the dome spraying while a dumping event is occurring as it is too much of an occupational risk.*

Response: Section 2.3.2.12 is amended to address this comment. The questioned narrative has been removed.

10:

Comment: *In Section 2.3.2.15, the ARM that is referenced has a period in front of it that should be deleted.*

Response: Section 2.3.2.15 is amended to address this comment. The period has been removed.

11:

Comment: *Under “Demand for Government Services”, the listed staff that deal with operations of the Class IV unit are Lincoln County sanitarian and Libby Landfill staff, but under “Personnel”, Asbestos Resource Program (ARP) is listed as a collaborator in the management of the Class IV unit. Does ARP need to be included in the “Impacts” chart? If not, can an explanation be given?*

Response: The “Impacts” table is amended to address this comment.